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The Civil Service Commission (CSC) is responsible for leadership in the Federal program for hiring, placing, and advancing handicapped persons. A recently accepted reorganization plan will transfer functions related to this program at the Equal Employment Opportunity Commission (EEOC). The Chair of the EEOC will become a co-chair of the Interagency Committee on Handicapped Employees. Findings/Conclusions: Some progress has been made towards improving Federal employment opportunities for the handicapped. Affirmative action plans are required at all executive agencies, and a 5-year experimental special emphasis program will soon be implemented to provide expected hiring authority and special selection procedures. Complaint procedures have been expanded to include appeals for complaints of discrimination based on handicaps. Agency advisory committees were established, training courses were developed, and tests were modified to accommodate handicapped applicants. The following problems remain unsolved: definitions of "handicapped individuals" and "reasonable accommodation" are vague, attitudes of individuals hamper progress, coordinated research efforts to develop assistive devices are lacking, and restrictive physical requirements for Federal positions unnecessarily exclude some handicapped persons. Also, as reported in 1974, CSC still is taking only an advisory role, placement coordinators lack adequate training and time, and program success cannot be measured because of the lack of

reliable data. Recommendations: In implementing their new responsibilities, the Chief of EEOC should: take a more directive role toward the program than that assumed by the CSC; conduct indepth, compliance reviews aimed at assessing agency accomplishments; work closely with the CSC and agency personnel offices to ensure that policies and procedures carry out program goals; make sure that selective placement coordinators are given sufficient training, time, and resources; develop the capability and staff resources to provide more technical assistance; address attitudinal barriers through an employee relations campaign; work with the General Services Administration to see that architectural barriers are removed promptly; and see that the program for handicapped persons is not overshadowed by programs for women and minorities. The Congress should enact legislation to give handicapped persons the rights enjoyed by others. (HTW)

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REPORT BY THE

Comptroller General

OF THE UNITED STATES

RELEASED

7/11/78

Federal Employment Of Handicapped People

What has happened to the Federal Government's hiring, placing, advancing, and retaining qualified handicapped individuals since GAO reported in 1974?

Concerned over apparent unresponsiveness of Federal departments to this national policy, the Chairman, House Committee on Science and Technology, asked GAO

- to look into the reasons for lack of progress;
- to identify any research which might help to more effectively recruit, employ, and promote the handicapped; and
- to determine whether positive changes had occurred.

Although employment opportunities have improved, problems still exist, and the report suggests possible legislative actions and recommendations to the Equal Employment Opportunity Commission.



FPCD-78-40
JULY 6, 1978



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

E-164031(3)

The Honorable Olin E. Teague
Chairman, Committee on Science and Technology
House of Representatives

Dear Mr. Chairman:

As requested in your July 8, 1977, letter, this report reviews Federal employment opportunities for handicapped individuals. It discusses both improvements in the Federal employment picture since our 1974 report and problems that remain.

The report suggests possible legislative actions and recommendations to the Equal Employment Opportunity Commission which, under the recently accepted Reorganization Plan No. 1, will have responsibility for enforcement and related functions of programs for handicapped individuals.

At your request, we did not obtain written agency comments. We did, however, informally discuss our findings with Civil Service Commission and Equal Employment Opportunity Commission officials and have included their comments where appropriate.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution until 5 days from the date of the report. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Thomas A. Skates".

Comptroller General
of the United States

D I G E S T

Although progress cannot be statistically proven because reliable data are not available to compare changes in hiring, retentions, and mobility, actions have been taken which should improve the employment picture for handicapped Federal employees.

Under the recently accepted Reorganization Plan No. 1 of 1978, favored by advocacy groups, all enforcement and other functions relating to Federal employment of handicapped individuals are expected to be transferred, along with other Federal equal employment opportunity programs, from the Civil Service Commission to the Equal Employment Opportunity Commission. The Chair of the Equal Employment Opportunity Commission will become a co-chair of the Interagency Committee on Handicapped Employees. This Committee was established by section 501 of the Rehabilitation Act of 1973.

Affirmative action plans are now required of all executive agencies, and a 5-year experimental special emphasis program soon will be implemented to provide excepted hiring authority and special selection procedures.

Existing complaints procedures have been expanded to include an appeals system for hearing complaints of discrimination based on physical or mental handicap. Establishing agency advisory committees, developing training courses, providing training funds, and modifying tests to accommodate handicapped applicants are recent steps giving handicapped persons the same opportunities afforded other individuals.

FPCD-78-40

PROBLEMS

Despite these changes, the Federal Government's program to increase employment opportunities for handicapped persons is a long way from being truly effective. Vague and broad definitions raise questions: Who is a "handicapped individual"? What are the Government's responsibilities for modifying jobs and worksites to provide "reasonable accommodation" for handicapped employees?

Architectural barriers, the attitudes of handicapped and nonhandicapped individuals, and the lack of a coordinated research effort to develop and fully integrate simple assistive devices hamper progress.

Outdated and restrictive physical requirements for Federal positions unnecessarily exclude some handicapped persons.

As GAO reported in 1974:

- The Civil Service Commission still is taking an advisory rather than a directive role in administering the program.
- The Commission has no sanctions to motivate uncooperative agencies.
- Selective placement coordinators are not always trained and cannot devote adequate time to the program because of collateral duties.
- Measuring program success is impossible because of unreliable data and inconsistent data collection.

Programs for handicapped individuals have never received the resources and attention that those for other groups, such as minorities and women, enjoy. The handicapped population, unlike other groups seeking equal opportunity, is not entitled to attorneys' fees for successful litigation, back pay for job applicants who successfully challenge discrimination, or the right to

proceed to Federal court with a new case if a formal complaint is tied up in administrative procedures for more than 180 days.

Merging Federal equal employment programs, transferring duties from the Civil Service Commission to the Equal Employment Opportunity Commission and possibly reorganizing the former, makes predicting future effectiveness of the programs for handicapped individuals difficult. As requested by the Committee, GAO did not request written agency comments. However, GAO discussed past weaknesses with officials of both agencies. But because duties have not been clearly delineated, neither they nor GAO can be specific in addressing future plans.

RECOMMENDATIONS

In implementing these new responsibilities, the Chair, Equal Employment Opportunity Commission should

- take a more positive and directive role toward the handicapped program than the advisory role assumed by the Civil Service Commission;
- conduct indepth, compliance reviews aimed at assessing agency accomplishments and commitments toward stated goals;
- work closely with the Civil Service Commission and agency personnel offices to ensure that personnel policies and procedures carry out the overall goals of the programs for handicapped individuals;
- make sure that selective placement coordinators are given sufficient training, time, and resources to carry out a successful program;
- develop the capability and staff resources to provide more technical assistance, particularly relating to research and development of assistive devices, job restructuring, site modifications, and accommodations;

- address attitudinal barriers through an employee relations campaign aimed at dissolving misconceptions about handicapped people;
- work closely with the General Services Administration to see that architectural barriers are removed as quickly as possible; and
- see that the program for handicapped persons is not overshadowed by the more firmly established programs for women and minorities.

RECOMMENDATIONS TO THE CONGRESS

The Congress should enact legislation to give handicapped persons the rights enjoyed by others under title VII of the Civil Rights Act of 1964 and the Civil Rights Attorneys' Fees Awards Act of 1976. These rights include back pay for Federal job applicants who successfully challenge discrimination, attorneys' fees for successful litigation, and the right to proceed to Federal court with a new case if a complaint is tied up in administrative procedures for more than 180 days.

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ABBREVIATIONS

CSC Civil Service Commission
GAO General Accounting Office
EEOC Equal Employment Opportunity Commission
HEW Department of Health, Education, and Welfare

CHAPTER 1

INTRODUCTION

The 1970 census showed that 11,265,000 persons in America considered themselves to have a health or physical condition which limited the kind of work they could do or the amount. Thus, 1 person in 11, or 9 percent of the adult population, in the age range of 16 to 64 is handicapped. The census findings also showed that these persons have not fared as well in income, education, and employment as the mainstream of America's population.

For many years the Federal Government has taken the position that it is not only a desirable social objective but also good business to employ handicapped persons. A Government-wide survey disclosed that in 1977, 140,808 (6.6 percent of the Federal work force) handicapped persons were employed by the Government.

The Civil Service Commission (CSC), charged with leadership and direction of the Federal Government program for hiring, placing, and advancing handicapped persons, has established an Office of Selective Placement in its Bureau of Recruiting and Examining. The target individuals are those who

- have a physical or mental impairment which substantially limits one or more of their major life activities;
- have a record of such an impairment; or
- are regarded as having such an impairment.

The legal basis for the program is Public Law 617 (5 U.S.C. 7153(1976)) enacted in June 1948 which prohibits discrimination because of physical handicap. Section 501 of the Rehabilitation Act of 1973, Public Law 93-112, (29 U.S.C. 791 (Supp. V 1975)), authorized programs to promote and expand Federal employment opportunities for handicapped individuals by

- establishing an Interagency Committee on Handicapped Employees,
- requiring Federal agencies to submit affirmative action plans to the above committee and to the CSC, and

--having CSC report annually to the appropriate congressional committees on Federal agencies' achievements.

The first formal policy statement on executive branch employment of handicapped persons was a letter from the President to agency heads in May 1957. Since that time, several other policy statements have stressed employment of handicapped persons in Federal service.

SCOPE OF REVIEW

In July 1977 the Chairman, House Committee on Science and Technology, concerned over the apparent unresponsiveness of Federal departments to the national policy of recruiting and employing qualified handicapped individuals, requested that we look into the reasons for the lack of progress. The Chairman also asked us to identify any research which might help to more effectively recruit, employ, and promote handicapped individuals and to determine whether positive changes had taken place since our 1974 review. 1/

For this review we visited the Civil Service Commission, the General Services Administration, and the Department of State and talked to selective placement coordinators at the agencies listed in appendix I. We reviewed affirmative action plans, statistics, evaluation reports, correspondence, personnel manuals, and other materials relating to handicapped employment. We examined CSC policies, procedures, and guidance issued to agencies and CSC's affirmative action plan review and approval procedures. We also interviewed handicapped employees, representatives of special interest groups, and the director of the Job Development Laboratory at George Washington University.

1/"Employment Opportunities in the Federal Government for the Physically Handicapped" (B-164031(3), Sept. 16, 1974).

CHAPTER 2

IMPROVEMENTS IN THE FEDERAL

EMPLOYMENT PICTURE

Recent actions should improve Federal employment opportunities for handicapped individuals. Some of these result from the President's Reorganization Project and the Rehabilitation Act of 1973, while others result from increased awareness of handicapped persons' problems and needs. However, because reliable statistics are not available (see p. 18), we cannot assess the degree to which these changes have improved the employment picture.

REORGANIZATION OF EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

On May 5, 1978, Reorganization Plan No. 1 of 1978 was accepted, consolidating the Federal Government's equal employment opportunity activities by making the Equal Employment Opportunity Commission (EEOC) the principal agency for fair employment enforcement in both the private and public sectors. Under the plan, authority to ensure nondiscrimination and affirmative action in Federal employment, including CSC's responsibilities under the Rehabilitation Act and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, will be transferred from CSC to EEOC before January 1, 1979. Thus the Government's program to improve employment for handicapped individuals will be combined with other equal opportunity programs and become part of a single coherent Federal program to combat job discrimination.

The President's Reorganization Project study, which led to the reorganization plan, reported that equal opportunity and affirmative action have not been pursued vigorously or administered effectively in Federal departments and agencies, that CSC had adopted substantially weaker standards than those imposed on Federal contractors in the private sector, and that CSC's instructions on affirmative action were considerably weaker than those required of Federal contractors. The study concluded that the Federal employment record was substantially poorer than that of private sector employers. The report states that transferring CSC's authority under the various antidiscrimination laws will ensure that Federal employees have the same rights and remedies as private sector employees.

INTERAGENCY COMMITTEE ON HANDICAPPED EMPLOYEES

The Rehabilitation Act of 1973 established this committee, originally comprising the CSC Chairman, the Administrator of Veterans' Affairs, and the Secretaries of Labor and Health, Education and Welfare (HEW). It was later expanded by Executive Order 11830 January 9, 1975 (40 Fed. Reg. 2411(1975)) to include representatives from the Department of Defense, General Services Administration, and Federal Communications Commission.

The committee's goals are to provide a focus for increased employment and to ensure an equitable, suitable, and functional environment for handicapped individuals in the Federal service.

Since March 1974, the committee has recommended some 89 changes relating primarily to developing complaint procedures, improving agency affirmative action plans, removing attitudinal and architectural barriers, and establishing an information system to collect Federal employment data. Most recommendations were forwarded to and affirmatively implemented by CSC. The status of the committee's recommendations is shown in appendix II.

AFFIRMATIVE ACTION PLANS

The Rehabilitation Act and the Vietnam Era Veteran's Readjustment Assistance Act of 1974 direct each executive branch department or agency, the Postal Service and Postal Rate Commission, and such instrumentalities as the Tennessee Valley Authority to submit to CSC affirmative action plans for hiring, placing, and advancing handicapped individuals, including separate specifications for disabled veterans. CSC has overall responsibility for issuing program guidance and approving agency plans. CSC guidance to the agencies dictates that the action plans must address:

- achieving full commitment to program goals,
- committing adequate resources to support program efforts,
- delegating appropriate authority to direct and accomplish program efforts,
- including sources of handicapped individuals and disabled veterans in ongoing recruitment efforts,

- ensuring that handicapped individuals and disabled veterans receive equal opportunities in hiring, placement, and retention,
- including handicapped employees in merit promotion, upward mobility, and training programs,
- evaluating program status and achievements in a systematic manner,
- maintaining an internal data collection system for program assessment and planning, and
- ensuring accessibility of facilities.

Approval is based on information provided by agencies and narrative reports of prior achievements. A satisfactory rating requires completeness and compliance with CSC guidance.

According to CSC, weaknesses in agency programs fell into four categories

- lack of comprehensive program assessment,
- limited use of personnel management evaluation,
- lack of action plan development and implementation, and
- insufficient commitment of resources.

While the Office of Selective Placement assesses an agency's accomplishments through its affirmative action plan, CSC's Bureau of Personnel Management Evaluation evaluates agency program effectiveness. In April 1976, as a result of a recommendation of the Interagency Committee on Handicapped Employees, the Bureau's general agency evaluation looked for changes resulting from the Rehabilitation Act and reasons for lack of progress. The evaluation found a need for integrating the selective placement program with all aspects of an agency's personnel management system and a need for onsite assessment of agency programs below the headquarters level. The Bureau of Personnel Management Evaluation is developing a questionnaire on these issues for future general agency evaluations.

UNPAID WORK EXPERIENCE

The Rehabilitation Act of 1973 offers handicapped individuals an opportunity to get unpaid work experience in Federal agencies. State vocational rehabilitation agencies develop individualized written rehabilitation programs, and Federal agencies are encouraged to supply the needed work experience and training. Federal agency actions include, but are not limited to

- determining if work locations are suitable for enrollees,
- contacting State vocational rehabilitation agencies for assistance in planning programs, and
- specifying in working agreements duties to be performed by enrollees.

Since CSC does not maintain statistics or information on the number of persons participating, effectiveness of the program cannot be measured.

COMPLAINT PROCEDURES

There were no procedures for hearing complaints of discrimination based on physical or mental handicap other than agency internal administrative procedures or negotiated agreements. In September 1977, CSC published for comment proposed administrative procedures to hear discrimination complaints of both employees and Federal job applicants.

Most comments contended that the procedures for processing complaints of discrimination based on race, color, religion, sex, national origin, and age should be used; some people questioned using these procedures because they are burdensome and are prolonged by an enormous backlog of cases. CSC elected to expand these procedures to include complaints of handicapping conditions rather than add a new system to the already numerous and varied mechanisms.

In response to comments by various advocacy groups, CSC added sections in the procedures to

- partially clarify what "reasonable accommodations" an agency can or should make to employ handicapped individuals,

- prohibit, except under certain circumstances, use of employment testing, preemployment medical examinations, and inquiries which tend to screen out qualified persons,
- ensure that qualified handicapped applicants and employees are not discriminated against because of inaccessible buildings, and
- make the procedures retroactive for 1 year prior to implementation.

The final procedures became effective on April 10, 1978. Advocacy groups generally agree that the amended procedures were greatly improved over the first version and should allow substantial progress, but they feel problems still exist. These are discussed in chapter 3.

Back pay

One benefit of initiating the complaint procedures is that handicapped employees can now be awarded back pay if they have been the subject of certain unwarranted or improper personnel actions. Even though no express statutory authority exists for awarding back pay to persons who can establish that they were discriminated against because of a mental or physical handicap, CSC in establishing the complaints procedures, took the position that the general authority of the Back Pay Act (5 U.S.C. 5596(1976)) is applicable. The Back Pay Act provides that an employee who successfully challenges an improper personnel action may be awarded pay and allowances for the period from the time the action was effective.

SPECIAL EMPHASIS PROGRAM

This 5-year experimental program is expected to start in 1978 and will cover persons with handicapping conditions, among others, who may be adversely affected by present hiring procedures.

Under the program, CSC will determine whether persons in special emphasis groups are proportionally represented in a given occupation. If not, excepted hiring authority and special selection procedures will be allowed for that particular occupation.

Reliable statistics are not available to determine whether any given occupation has a shortage of handicapped

employees. However, handicapped persons will be included in target recruiting since a shortage in any one special emphasis group triggers excepted hiring authority and special selection procedures for all groups.

The program is expected to authorize appointments in the excepted service to be converted to competitive status after 2 years of successful work performance; thus these employees will be integrated with the mainstream of Federal employment.

OTHER ACTIONS

Other steps have been taken to improve the employment picture for handicapped people.

- Agency advisory committees have been established to apprise management of the needs of handicapped employees.
- Training courses have been developed for selective placement coordinators and supervisors of handicapped employees.
- The Comptroller General decision of September 23, 1977, (B-188710) held that certain special expenses such as readers, sign language interpreters, braille, etc., necessary to participate in Government training courses provided under 5 U.S.C. 4109 may be paid with appropriated funds.
- CSC tests are now available in large print and braille, and some oral test requirements have been waived for deaf applicants.
- The Professional and Administrative Career Examination has been adapted for blind and deaf applicants.
- The grade limitation for 700-hour (approximately 4 months) trial appointments was eliminated in March 1977 so persons can be employed at higher grades.
- Regulations on nepotism were amended to allow severely handicapped or mentally retarded persons to be employed at the same agency as a parent to help overcome transportation barriers.

CHAPTER 3

REMAINING PROBLEMS

In spite of the changes discussed in the previous chapter, the program to improve employment opportunities for handicapped individuals still faces many problems. Some obstacles surfaced from passage of the Rehabilitation Act, while others are longstanding, encompassing individual attitudes and commitments to the program.

DEFINITIONS

Broad definitions of terms, such as "handicapped individual" and "reasonable accommodation," leave questions as to who is handicapped and what are the Government's responsibilities to modify jobs and worksites to accommodate employees.

Handicapped individual

Identifying persons who should be covered in the Government's efforts to improve employment opportunities is complicated by the inability to specifically define who is handicapped. For example, there are more than three dozen definitions in Federal legislation and regulations referring to handicapped and disability.

In May 1977, HEW issued regulations (42 Fed. Reg. 22676 (1977)) to ensure that federally assisted programs and activities are operated without discrimination on the basis of handicap. These regulations define handicapped persons and major terms in the Rehabilitation Act as follows:

"'Handicapped person' means any person who i) has a physical or mental impairment which substantially limits one or more major life activities, ii) has a record of such impairment or iii) is regarded as having such an impairment."

"'Physical or mental impairment' means (A) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological musculoskeletal; special sense organs; respiratory; including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or (B) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities."

"'Major life activities' means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working."

"'Has a record of such an impairment' means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities."

"'Is regarded as having an impairment' means (A) has a physical or mental impairment that does not substantially limit major life activities but that is treated by a recipient as constituting such a limitation; (B) has a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others toward such impairment; or (C) has none of the impairments defined but is treated by a recipient as having such an impairment."

The analysis of the regulation further explains that the definition includes such diseases as heart disease, diabetes, emotional illness, drug addiction, and alcoholism. Including drug addiction and alcoholism created considerable controversy, but they remained in the regulation after the Attorney General ruled these conditions are "physical and mental impairments" within the meaning of the Rehabilitation Act. 1/ CSC has adopted the HEW definition.

Administering a program to cover such a broad range of handicapping conditions is difficult since each handicap has unique problems and needs. Some people say the Rehabilitation Act definition is so broad almost anyone can be considered handicapped. Others believe the broad coverage may mean those who are severely disabled will not be hired because agencies can meet their affirmative action goals by hiring individuals with slight handicaps.

1/The issue is not closed, however, on May 16, 1978, H.R. 12467 was passed by the House of Representatives which in part would amend the Rehabilitation Act to exclude alcoholics and drug abusers in need of rehabilitation from the employment discrimination provisions of sections 503 and 504 of the act.

Reasonable accommodation

CSC's recently adopted discrimination complaint procedures, following the regulations established by HEW, state that:

- "(a) An agency shall make reasonable accommodation to the known physical or mental limitations of a qualified handicapped applicant or employee unless the agency can demonstrate that the accommodation would impose an undue hardship on the operation of its program.
- "(b) Reasonable accommodation may include, but shall not be limited to: (1) making facilities readily accessible to and usable by handicapped persons, and (2) job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, appropriate adjustment or modification of examinations, the provision of readers and interpreters, and other similar actions.

In determining pursuant to paragraph (a) of this section whether an accommodation would impose an undue hardship on the operation of the agency in question, factors to be considered include:

- (1) the overall size of the agency's program with respect to the number of employees, number and type of facilities and size of budget; (2) the type of agency operation, including the composition and structure of the agency's workforce; and (3) the nature and the cost of the accommodation."

Although this describes "reasonable accommodation" somewhat, the definitions are still subject to interpretation. For instance, advocacy groups believe the word "reasonable" is not strong enough to force employers to accommodate handicapped applicants and employees.

The problems surrounding these definitions are numerous and complex and perhaps can only be resolved as the definitions are refined through individual actions and court decisions.

WEAKNESSES REPORTED BY GAO IN 1974

In 1974, we reported that the Selective Placement Program could be strengthened by

- increasing CSC resources,
- improving the agency coordinator systems, and
- improving the system for collecting data to measure program effectiveness.

Four years later we find that while some progress has been made along these lines, many problems and weaknesses still exist.

Civil Service Commission

Primary responsibility for the program to promote handicapped employment is now vested in CSC's Office of Selective Placement. Under the recently accepted Reorganization Plan No. 1 of 1978, the responsibilities dealing with review and approval of affirmative action plans will move to EEOC but personnel policies and procedures for handicapped employees will remain in CSC.

Staff resources were increased from two professionals at the time of our 1974 review to seven professionals in 1978. The staff is responsible for approving affirmative action plans, providing assistance to agencies, working on grievance procedures, updating the Federal Personnel Manual, keeping abreast of technological developments, and providing staff support to the Interagency Committee on Handicapped Employees. As in 1974, we found that the Office of Selective Placement managers were personally committed to an effective program for employing disabled persons. All of them felt they could use additional staff resources particularly with the anticipated workload resulting from the new grievance procedures.

Most Federal agency coordinators whom we contacted spoke favorably of the efforts and support rendered by the CSC staff. Several commented, however, that the CSC managers should work more closely with them. One agency coordinator said the Office of Selective Placement's activities were primarily ceremonial or window dressing and CSC should provide more technical and actual day-to-day program assistance. He also felt more could be done to provide an exchange of information among the agencies so coordinators could gain from others' experiences.

CSC has always taken a leadership or advocacy role rather than an enforcement role in administering the Federal Government's handicapped program. According to the report accompanying the President's Reorganization Plan No. 1 of 1978, CSC, in all equal employment opportunity programs, has,

for the most part, adopted weaker standards of performance and weaker instructions on affirmative actions than those imposed on Federal contractors by the Department of Labor. In addition, CSC has no sanction to force negligent or recalcitrant agencies to be more responsive. The strongest action taken to date was a letter signed by the Co-chair of the Interagency Committee on Handicapped Employees to the following agencies which had not submitted satisfactory plans for 1978.

Civil Aeronautics Board
Community Services Administration
Equal Employment Opportunity Commission
Export-Import Bank
Farm Credit Administration
U.S. Information Agency
Department of Justice
Department of State
Occupational Safety and Health Review Commission
Pension Benefit Guaranty Corporation
Small Business Administration
Smithsonian Institute
Soldiers' and Airmen's Home

Only EEOC has not responded to the Co-chair's letter.

Evaluating agency progress is, for the most part, limited to approval of program assessments in affirmative action plans. Evaluations are based primarily on paperwork submitted by the agencies and rarely involves a site visit. CSC's Bureau of Personnel Management Evaluation is developing a questionnaire for future general evaluations. However, it will not provide an indepth analysis or point out problem areas that a compliance review would.

The agency coordinator system

CSC describes the Selective Placement Program as a "chain of cooperation," extending from CSC through the Federal agencies to the State rehabilitation services with the agency coordinators being the key to success. There are about 1,800 selective placement coordinators at two levels within most Federal agencies. Staff coordinators at the agency level are concerned with program matters, and operating coordinators at the field or component level are concerned with recruiting, placing, and counseling.

Responses to a 1973 GAO questionnaire showed employing and advancing handicapped persons was hampered because coordinators

- were not selected on the basis of interest or qualifications,
- were assigned other duties and could not devote sufficient time to the program,
- did not monitor progress of handicapped employees after placement, and
- did not actively recruit, conduct job surveys, or restructure jobs.

Through our discussion with selective placement coordinators we learned:

- Coordinators still do not feel they have sufficient time to devote to the program because of other duties.
- Most coordinators were designated or assigned the responsibility. 1/
- Most coordinators were aware of their duties and responsibilities as set forth in the Federal Personnel Manual.
- Only 5 of the 16 coordinators contacted had had training relating to the handicapped program. Six more were scheduled to take the CSC course for coordinators.
- Most coordinators were not aware of the CSC training package for supervisors of handicapped employees.
- Management commitment ranged from very little support to extremely positive. Those coordinators indicating poor support said managers were so bombarded with special emphasis programs, no one program could be given the attention it deserved.
- Most agencies do not have advisory committees.
- The agencies we contacted do not have active recruiting programs solely for handicapped persons. Vacancy announcements are sent to sources of handicapped ap-

1/Even though most of the coordinators with whom we spoke had not volunteered for the assignment, all seemed interested and concerned with doing their best.

plicants, such as State rehabilitation services, schools, and advocacy groups.

--Some coordinators made surveys to identify jobs which could be filled by handicapped persons. Others felt this was not necessary because, with the broad definition of handicapped, every job could be filled by a handicapped person.

When asked what could be done to improve the selective placement program, coordinators suggested the need to

- give the coordinators more time and resources,
- work with attitudes of managers and supervisors to accept handicapped employees,
- have greater management support,
- take more aggressive actions in recruiting and other personnel activities, and
- formally identify jobs that can be performed by handicapped persons.

We visited two agencies and found great disparity between their selective placement programs.

General Services Administration

The General Services Administration had a full-time coordinator who had developed very comprehensive affirmative action plans as well as an internal assessment program. The coordinator was selected because of her interest and had attended CSC training courses. She felt she had the full support and commitment of top management. Files evidenced close contact with regional coordinators as well as advocacy groups, researchers, and other agency coordinators. The files also included policy statements, notices, and other materials publicizing the program.

Department of State

The Department of State, on the other hand, had little to show that it had a program at all. The selective placement coordinator stated that he spent minimal time on the program, and the files showed no evidence of management support. At the time of our review, the Department was 8 months late in submitting an affirmative action plan in spite of a letter from the Interagency Committee on Handicapped Employees.

The Department has always contended that its requirement that Foreign Service employees be available for assignment anywhere in the world precluded hiring handicapped individuals because of limited medical facilities at isolated posts. According to one State Department official, the attitude of worldwide availability also affects employment of handicapped people in the agency's 4,000 civilian positions in the United States.

Advocacy groups have strongly attacked the Department's policy toward Foreign Service hiring and the Department has had to answer numerous congressional inquiries. In March 1976, the Interagency Committee on Handicapped Employees sent a letter to the Secretary of State recommending that physical standards be revised to eliminate unnecessary employment barriers. In December 1977 new standards were approved, but changes were limited to allowing single amputees or persons with vision in one eye or cosmetic disfigurements to enter the Foreign Service.

In July 1977 a State Department affirmative action task force criticized the Department's attitudes and abysmal record in handicapped employment. The report stated that the Department consistently pursued unwritten policies which were totally inconsistent with affirmative action and violated the spirit of the Rehabilitation Act.

The task force made several recommendations, including establishing a high-level handicapped coordinator position, designating posts abroad suitable for handicapped persons, modifying the Foreign Service officer examination, accelerating recruiting and hiring for stateside positions, and allowing persons with unchanging disabilities in the foreign service. As of May 1978, an implementation working group had submitted proposals to the secretary on how to implement the recommendations of the affirmative action task force and a selective placement coordinator had been named.

Data collection to measure program results

Using samples of the American national population, the 1970 census questioned persons about their disabilities affecting employment and the duration of the disability. The questions were self-defining; the person alone decided whether he was handicapped. The President's Committee on Employment of the Handicapped did not feel that self-identification lessened the value of the sampling since handicapped persons' status in society very often depends on how they perceive themselves.

Identifying the handicapped labor force is further complicated because there are two ways to look at unemployment.

One way is to consider only those persons who are unemployed and actively seeking work. By this definition, the census found that the unemployment rate of the handicapped population was about the same as the general unemployment rate--around 5 percent. The other is to consider those people who are not working nor looking for work. According to this second definition, the census showed that only 42 percent of the handicapped population is employed compared to 59 percent of the total population.

Accurate data collection within the Government has always been a problem in measuring success of efforts to hire, place, advance, and retain handicapped individuals. Statistics on excepted appointment of handicapped individuals show that appointments have increased steadily since the program's inception in 1964.

<u>Calendar years</u>	<u>Excepted appointments</u>
1964-65	19
1966-67	129
1968-69	385
1970-71	910
1972-73	789
1974-75	1,285
1976-77	2,200

These excepted appointments, however, represent only a small fraction of the handicapped persons actually employed by the Federal Government.

For its annual reports to the Congress, CSC, based on agency data, reported:

<u>As of December 31</u>	<u>Number of agencies</u>	<u>Total employees</u>	<u>Handicapped employees</u>	<u>Percentage of handicapped employees</u>
1973	88	2,674,021	77,753	2.91
1974	78	2,722,343	76,627	2.81
1975	77	2,730,342	74,400	2.72
1976	78	2,625,667	73,457	2.80

The 1973 data was the first attempt to report all handicapped employees, and there was considerable confusion as to whom to report. Consequently, CSC believes the 1973 data might not be comparable to data for later times.

In 1974, GAO, recognizing the need for reliable statistics, recommended a Government-wide survey. CSC resisted because it feared that "to significant numbers of persons, this survey would be viewed as an affront. Still others would be seriously concerned about the invasion of their right to privacy." CSC foresaw a "high probability of inaccuracy, inconsistency, and honest disagreement."

In 1977, as a result of the Interagency Committee on Handicapped Employees' recommendation, CSC restructured its data collection procedures for handicapped employees. The new data was initially collected through a one-time Government-wide self-identification survey and will be updated with new accessions and separations to reflect changes. Agencies were instructed to emphasize that the survey was strictly voluntary and employees were to be made fully aware that the information would not be used against them in any way.

The number of handicapped employees amounted to 2.80 percent of the work force in December 1976 and jumped to 6.64 percent in March 1977.

	<u>Total employees</u>	<u>Handicapped employees</u>	<u>Not identified, available, or specified</u>	<u>Percentage of handicapped employees</u>
3/31/77	2,121,786	140,808	513,530	6.64

The increased percentage reflected the broadened definition of handicapping conditions under the Rehabilitation Act and the new self-identification procedures. Whether the number and types of handicapped employees included in earlier surveys increased or not is unknown.

The Office of Selective Placement believes the survey was a "good data collection effort." It plans to purify the data somewhat by followup with agencies having a high percentage of employees who did not respond to the questionnaire. CSC does not feel, however, it has the resources or authority to completely validate the data through an audit or other evaluation technique. The issue is further complicated by the Privacy Act (5 U.S.C. 552a (1976)) and the sensitivity of employees.

The data base is updated with new accessions or separations. CSC plans to use the data in the future to measure

program results. New hires, employee mobility, advancement, training, retention, and other aspects of employment will be analyzed. However, because time is needed to develop the computer program, purify the data, and establish trends, CSC does not foresee full use of the data system to provide these statistical analyses for several years.

Cursory review of the unedited data discloses that almost 25 percent of the total work force covered were either not identified, not available, or otherwise unspecified. In two agencies this figure was as high as 60 percent. Many handicapped and nonhandicapped employees were offended by the survey and felt it was "none of management's business." Some entire work sections are said to have indicated a particular handicap. The survey was also based on an individual's perception of his physical condition. Thus, some handicapped persons indicated no disability while others who may have had slight impairments identified themselves as being handicapped. According to some agency coordinators, handicapped persons did not want to identify themselves for fear of discrimination or for personal reasons. For example, one blind employee very concerned with handicapped activities did not consider himself handicapped in performing his job so he chose not to identify himself.

ATTITUDINAL BARRIERS

A difficult problem to deal with is the attitude of nonhandicapped people who look at handicapped individuals' disabilities rather than abilities. Attitudinal barriers are very complex encompassing pity, paternalism, fear or discomfort around handicapped persons, lack of knowledge, and the general attitude that disabled persons are "different."

Ironically, program effectiveness is also hampered by the attitude of the handicapped population itself. Many handicapped individuals do not want to be singled out or have attention drawn to them, as evidenced by resistance to the self-identification survey. Even the "Outstanding Handicapped Federal Employee of the Year" program, which was established in 1968 to focus attention on the capabilities and contributions of handicapped employees and to publicize career opportunities, is viewed distastefully by some employees as fostering separateness and inequality. In one agency, a frequently heard complaint was that the award singles out the disabled as members of a minority group and it applies negative connotations.

ARCHITECTURAL BARRIERS

In July 1975, GAO issued a comprehensive report 1/ identifying numerous problems hampering the removal of architectural barriers in public buildings. In April 1977 a congressional panel 2/ found that existing public laws for barrier free buildings were inadequately enforced. We did not further address these problems, but we did learn that the General Services Administration has accelerated its remodeling program to provide "essential access" which includes modifying entrances, restrooms, fountains, and telephones. The completion date was moved forward from 1981 to the end of 1979.

SELECTIVE PLACEMENT VS. EQUAL OPPORTUNITY

The Federal Government has been involved in combating employment discrimination since 1940 when President Roosevelt issued the first order prohibiting discrimination by Government agencies. Historically, the Selective Placement Program, concerned primarily with hiring, placing, and advancing handicapped individuals, has not received the resources and attention that programs for other groups such as women and minorities have enjoyed. While most of the 1,800 selective placement coordinators spend less than 10 percent of their time on the handicap program, over 12,000 staff-years, including 3,151 full-time employees, are devoted to other groups' activities. Their programs include complaint investigation and conciliation, upward mobility and program direction, and research.

CIVIL RIGHTS AFFORDED OTHER GROUPS

Handicapped individuals are not afforded the same civil rights that other groups enjoy. They are not entitled to attorney's fees for successful litigation, back pay for applicants who successfully challenge discrimination practices, or certain rights pertaining to review in Federal courts.

1/"Further Action Needed to Make All Public Buildings Accessible to the Physically Handicapped" (FPCD-75-166, July 15, 1975).

2/Report of the Panel on Research Program to Aid the Handicapped to the Committee on Science and Technology, U.S. House of Representatives, April 1977.

Back pay for applicants

While the recently implemented complaint procedure allows for back pay for employees who bring a successful complaint of discrimination, it does not apply to applicants. CSC does not have the legal authority to do this for applicants complaining of handicap discrimination, although it does have such authority for complaints under title VII of the Civil Rights Act of 1964, as amended, involving discrimination on the basis of race, color, religion, sex or national origin.

Review in Federal courts

Once an agency makes an adverse decision in a handicap discrimination case, the complainant may appeal that decision under the Federal Administrative Procedure Act. Under title VII, complainants may proceed into Federal Court if they have not received a final decision 180 days after a complaint was filed. However, discrimination based on handicapping condition is not included under the Civil Rights Act; thus, handicapped complainants cannot proceed into Federal Court until all administrative procedures have been concluded. In some cases, this could take years because the administrative procedures are complicated and time consuming and the complaint system is backlogged.

Another issue involves the standard of review in Federal court. The U.S. Supreme Court 1/ has held that persons complaining of discrimination based on race, sex, religion, color, or national origin under title VII are entitled to a new trial or a trial from the beginning. Since handicapping condition was not included in the decision, handicapped complainants under the Federal Administrative Procedure Act would be restricted to review of the administrative record and the complainant would have to show that the agency decision was "arbitrary, capricious or an abuse of discretion or otherwise not in accordance with the law" or "unsupported by substantial evidence."

Attorneys' fees

Since handicapped persons are not covered under the Civil Rights Attorneys' Fees Award Act of 1976 (42 U.S.C. 1981 note, 1988), they are not entitled to attorneys' fees if the decision

1/Chandler v. Roudebush, 425 U.S. 840 (1976).

is made in their favor. Thus, the litigation costs must be totally borne by the complainant. This situation may discourage or thwart actions which otherwise may be taken if the complainant had the same rights afforded other groups. 1/

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

As stated earlier, under the recently accepted Reorganization Plan No. 1, overall responsibility for equal employment opportunity programs and the handicapped program will be transferred from CSC to EEOC.

The report accompanying the plan recognized that EEOC has had serious problems in the past including poor management, lack of adequate staff training, excessive delays in processing charges, and failure to address systemic discrimination. Advocacy groups have pointed out EEOC has a poor employment record for handicapped employees, 0.04 percent 2/ compared to the overall Government average of 6.64 percent. Such architectural barriers as inaccessible entrances, bathrooms, telephone booths, and drinking fountains also make the EEOC building an undesirable working place for handicapped individuals. In addition EEOC did not submit an approved affirmative action plan for 1978.

RESEARCH AND TECHNOLOGY

The April 1977 congressional panel issued a report to the House Committee on Science and Technology addressing problems in research programs for the handicapped public. The panel concluded that present research efforts by the Government and private enterprise are miniscule and extremely fragmented with little or no coordination or direction. Compounding the problem is the fact that the results of such research are often unavailable to the handicapped public. Among other things, the panel found that emphasis was being placed on high technological solutions and complex devices, particularly for severely handi-

1/On May 16, 1978, the House of Representatives passed H.R. 12467 which amends the Rehabilitation Act of 1973 to allow for attorneys' fees awards to successful complainants.

2/Only one handicapped employee was identified in a March 1977 survey.

capped persons' employment prospects in both the public and private sectors.

Handicapped people can perform many jobs if simple job modifications are made or assistive devices are provided. The Job Development Laboratory at George Washington University has demonstrated the success of this approach. The Laboratory's primary function is to design inexpensive and simple devices to help handicapped persons obtain and retain jobs. In a recent program, the Laboratory placed 80 individuals in Government and private jobs. The average cost to modify the job site or provide assistive devices was only \$153, and the time needed to develop the needed devices was 2 hours. For example, a 41-year-old man with cerebral palsy who had a master's degree in sociology could not get a job. By purchasing a microfilm reader so he would not have to handle pages of source documents, the Laboratory found him a job as a locator with a Government agency. After about 18 months, the man was promoted to a job classification specialist.

The Director of the Job Development Laboratory believes the greatest hindrance to better use of assistive devices is the lack of centralized or coordinated effort by researchers. He stated, however, that researchers are becoming aware of the problems and recognize the need for a centralized data bank. He added that, in his dealings with Federal selective placement coordinators, he found a general lack of knowledge of technological developments, and he felt that coordinators should be better educated as to the needs of handicapped people and what equipment was available. He believed part of the problem was the limited time (less than 10 percent) spent by the coordinator on selective placement.

We found no one in the Federal Government responsible for ensuring that the Government takes advantage of technological advances and no one with the technical expertise to duplicate the successes of the Job Development Laboratory. The program managers in the Office of Selective Placement were aware of some technological developments and one manager was assigned to keep abreast of the technology, but she did not consider herself by any means an expert. Since there is no focal point in either private industry or in

the Government, agency selective placement coordinators are left to their own means to modify or restructure work-sites. 1/

OTHER CONCERNS OF ADVOCACY GROUPS

Recognizing that beneficial changes are being made, advocacy groups are still concerned with certain problem areas. These groups strongly advocate that the physical requirements spelled out for each job classification in the Qualifications Standards Handbook (X118) be revised. The standard paragraphs used for many positions have not been revised since 1961 and could unnecessarily preclude handicapped applicants. For instance, the standard paragraph setting the physical requirements for the management analysis series reads:

"Good distant vision in one eye and ability to read without strain printed material the size of typewritten characters are required, glasses permitted. Ability to hear the conversational voice, with or without a hearing aid. In most instances, an amputation of arm, hand, leg, or foot will not disqualify an applicant for appointment, although it may be necessary that this condition be compensated by use of satisfactory prosthesis."

By this standard neither blind nor deaf persons could be employed for jobs for which primary requirements are a good "analytical ability and a practical and theoretical knowledge of the functions, processes, and principles of management." The same paragraph applies to the entire biological sciences group--a discipline which is often performed in a laboratory environment where deaf persons could work quite effectively.

CSC is now reviewing the physical standards to avoid unnecessarily precluding qualified handicapped individuals.

Advocacy groups have suggested that:

1/H.R. 12467 passed by the House of Representatives on May 16, 1978, includes extensive provisions for promoting and coordinating rehabilitation research and programs.

- Preemployment medical examinations for certain jobs may unnecessarily preclude qualified handicapped applicants from obtaining a job.
- The complaints procedures which became effective on April 10, 1978, be made retroactive to the date of the Rehabilitation Act, September 26, 1973. CSC, after reviewing the issue from an administrative standpoint, determined it was not feasible to reconstruct circumstances that far back but did compromise by making the procedures retroactive for 1 year prior to implementation.
- CSC increase public awareness by more widely disseminating information and regulations concerning the rights of handicapped individuals and the responsibilities of the Federal Government to employ these individuals.

CHAPTER 4

CONCLUSIONS AND RECOMMENDATIONS

Employment opportunities for handicapped persons in both private industry and the Federal sector should improve with the effects of the Rehabilitation Act and the increasing demands for rights for handicapped people. Changes resulting from the President's Reorganization Plan No. 1, the CSC's proposed Special Emphasis Program, and the newly established complaints procedures along with other changes, such as providing training and adapting employment tests, should improve opportunities.

Problems still exist, many of which are complex and have no simple or immediate solutions. Assessing past progress is impossible because of unreliable statistics, changes in data collection methods, and expanded definitions of handicapping condition. Measuring progress in the future may be difficult because data collection is inherently hampered by employee privacy rights and the sensitivity of handicapped employees.

The extent to which recent definitions of "handicapped individual" and "reasonable accommodation" will complicate the Government's program remains to be seen, and it is possible that the terms will be clarified and refined only through individual cases and court decisions.

Other problems, however, can be addressed through strong commitment and affirmative action on the part of legislators, administrators, agency heads, agency coordinators, managers, and employees at all levels. Handicapped individuals should be provided the same legal rights afforded other groups under title VII of the Civil Rights Act and the Civil Rights Attorneys' Fees Awards Act. The agency coordinator system needs to be strengthened; and attitudinal, architectural, and technological barriers must be removed so handicapped persons can be fully integrated into the mainstream of employment.

RECOMMENDATIONS

These problems require a strong and effective approach by the agency having overall responsibility for the Government's program. Under the recently accepted Reorganization Plan No. 1 of 1978, all enforcement and other functions relating to Federal employment of handicapped individuals are expected to be transferred along with other equal employment opportunity programs from CSC to EEOC. We recommend that, in implementing these new responsibilities, the Chair, EEOC

- take a more positive and directive role toward the handicapped program than the advisory role assumed by CSC,
- conduct indepth compliance reviews aimed at assessing agency accomplishments and commitments toward stated goals,
- work closely with CSC and agency personnel offices to ensure that their personnel policies and procedures carry out the overall goals of the programs for handicapped individuals.
- ensure that selective placement coordinators are given sufficient time, training, and resources to carry on a successful program,
- develop the capability and staff resources to provide more technical assistance, particularly relating to research and development of assistive devices, job restructuring, site modifications, and accommodations,
- address attitudinal barriers through an employee relations campaign aimed at dissolving misconceptions about handicapped people,
- work closely with the General Services Administration to see that architectural barriers are removed as quickly as possible, and
- see that the program for handicapped persons is not overshadowed by the more firmly established programs for women and minorities.

RECOMMENDATION TO
THE CONGRESS

The Congress should enact legislation to give handicapped persons the rights enjoyed by others under title VII and the Civil Rights Attorneys' Fees Awards Act of 1976. These rights include back pay for applicants who successfully challenge discrimination, attorneys' fees for successful litigation, and the right to proceed to Federal courts with a new case if a complaint is tied up in administrative procedures for more than 180 days.

AGENCIES WHOSE SELECTIVE PLACEMENT
COORDINATORS WERE CONTACTED

Office of the Secretary of Defense
Department of Commerce
Department of Agriculture
Department of the Interior
Department of Labor
Department of State
Environmental Protection Agency
Federal Communications Commission
General Services Administration
Interstate Commerce Commission
Veterans Administration

CIVIL SERVICE COMMISSION REPORT ON
STATUS OF RECOMMENDATIONS BY
THE INTERAGENCY COMMITTEE ON HANDICAPPED EMPLOYEES

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICM ACTION
1	It is recommended that the definition of handicapped codes be revised and expanded to provide for a more definitive medical identification of the disabled.	1-28-75	2-14-75	CSC	Implemented--FPM Letter 290-10, dated September 10, 1976, revised the codes. See Recommendations 12 through 21.	Closed
2	It is recommended that the current reporting system be expanded to include the number and type of handicapped individuals who have received services through the selective placement program.	1-28-75	2-14-75	CSC	Under Study--Recommendations 2 and 3 are being referred to the work group currently studying the coordinators program.	July 1978 Review
3	It is recommended that procedures be established for coordinators of selective placement to report on the types of services provided to handicapped individuals.	1-28-75	2-14-75	CSC	See Recommendation 2.	
4	It is recommended that the Handbook of Selective Placement be revised to include: <ul style="list-style-type: none"> - the requirements of section 501 of Public Law 93-112; - the requirements of section 403 of Public Law 93-501, as they relate to disabled veterans; - the concepts and guidelines included in the addendum to this report on the "Selective Placement Process." 	1-28-75	2-14-75	CSC	Partially Implemented. Implemented. Implemented.	July 1978 Review
5	It is recommended that the "standards for evaluation" developed by the ICHE be used by CSC program managers as a yardstick for evaluating affirmative action program plans that have been submitted by agencies.	1-28-75	2-14-75	CSC	In Process--This has been included in the draft rewrite of the handbook. Target Date: June 30, 1978. Implemented--CSC program managers have used the ICHE standards in evaluating agency affirmative action program plans.	Closed

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
6	It is recommended that the content of the "standards for evaluation" report be reviewed by the U.S. Civil Service Commission for inclusion, where appropriate, in their annual FPM insurances to agencies providing instructions for the submission of affirmative action program plans.	1-28-75	2-14-75	CSC	Implemented--Concepts contained in "standards" report included in FPM instructions to agencies for preparation of their affirmative action program plans. (See FPM letter 306-10, "Affirmative Action Plans for Employment of Handicapped Individuals and Disabled Veterans" dated January 31, 1976).	Closed
7	It is recommended that agency achievements in the area of employment of the handicapped be evaluated on the basis of: (1) the agencies' reports of the previous year's achievement in implementing their affirmative action program plans; (2) the evaluation made by the program managers in the Office of Selective Placement Programs, Civil Service Commission; and (3) the evaluation conducted by the Bureau of Personnel Management Evaluation, (BPME) Civil Service Commission.	1-28-75	2-14-75	CSC	Implemented.	Closed
8	It is recommended that evaluators from the Civil Service Commission's Bureau of Personnel Management Evaluation (BPME) focus greater attention on the practices and achievements of agencies in hiring, placement, and advancement of handicapped individuals during their regular program evaluations of agencies.	1-28-75	2-14-75	CSC	In Process--BPME is being requested to conduct a special evaluation inquiry on five agencies that have not had approved affirmative action plans or satisfactory achievements. Target Date: June 30, 1978.	July 1978 Review
9	It is recommended that the Commission (BPME) conduct a special evaluation inquiry if the results of the current year's program evaluation indicate a need.	1-28-75	2-14-75	CSC	See Recommendation 8.	
10	It is recommended that before issuing guidelines and instructions to agencies, the Civil Service Commission, when appropriate, solicit the views and suggestions of organizations with a legitimate interest in the selective placement program, such as labor organizations and veterans organizations.	1-28-75	2-14-75	CSC	Implemented.	Closed

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHR ACTION
11	<p>It is recommended that the Civil Service Commission, in consultation with the Inter-agency Committee on Handicapped Employees, develop procedures to cover complaints of alleged discrimination against handicapped applicants seeking employment.</p>	1-28-75	2-14-75	CSC	In Process--On Sept. 16, 1977, CSC published for comment in the Federal Register, proposed regulations. Final regulations should be published by early March 1978.	July 1978 Review
12-21	<p>The following recommendations relate to the proposed information system for the collection of data regarding the employment of handicapped individuals. It is recommended that:</p> <ul style="list-style-type: none"> o the data collection system be <u>voluntary</u>; o employees be advised of the reason for which information is being collected, how it will be used, and their right to elect not to have such data recorded in their manual or automated records; o the information be obtained from existing medical records, or if not available, directly from the employee; o employees be able to verify information; o the information not be used for any purpose other than program evaluation, monitoring of affirmative action programs and employment statistical analysis; o the CSC, departments, and agencies take all necessary means for safeguarding the information; o full notification be given to the national offices of the major Federal unions of the new reporting system, its purpose, the voluntary nature of data collection, etc; 	1-28-75	2-14-75	CSC	Implemented--The first data output has been received. Ninety percent of Federal employees responded to the survey. Efforts are being made to obtain 100 percent participation by current employees, and data are being collected on all new accessions.	Closed

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICRHE ACTION
22	<ul style="list-style-type: none"> o there be a redefinition and redesign of the existing data element; o there be a revision of data documents; and o the data collection procedures outlined in the proposal be followed. <p>It is recommended that each agency be required to incorporate into its management by objectives system a goal or objective on the recruitment, hiring, and career development of disabled persons. This action would require the head of the agency to "track" the implementation of the objective, demonstrate in writing a commitment on the part of top management to an affirmative action program, and clearly delegate both responsibility and accountability for the program.</p>	11-21-75	12-29-75	CSC	Implemented--The concepts conveyed by this recommendation have been included in FPM Letter 306-12, which requires top-level commitment to program objectives demonstrated in writing, a statement of delegation of responsibility, and objectives that can be clearly tracked within a given time frame.	Closed
23	<p>Coordinators for Selective Placement, in carrying out their role of advocate, should work with handicapped employees to form a handicapped employees interest group. It is recommended that such agency head support the organization of such a group to meet with top level staff on a periodic basis in order to receive the group's input into the affirmative action program. The agency head should plan to attend at least one of the meetings annually. In dealing with these interest groups, agencies are reminded of their responsibilities under Executive Order 11491, as amended, and, it is suggested that interest groups meet with labor organizations to exchange information and views.</p>	11-21-75	12-29-75	CSC	Implemented--As per CSC instructions, most agencies have organized handicapped employees interest groups and many have a part in the planning and implementation of affirmative action programs.	Closed
24	<p>It is recommended that the Civil Service Commission include or expand in all appropriate training guides segments on the employment of handicapped individuals. Of special interest are those training programs for supervisors, managers, personnel staffing specialists, and employee development personnel (agency trainers).</p>	11-21-75	12-29-75	CSC	Implemented--A special supervisors training course has been developed and segments on employment of handicapped individuals have been included in other supervisory management and personnel courses. Continued efforts will be made in this area.	Closed

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
25	It is recommended that agencies, as part of their affirmative action program plans, include in their orientation programs for new employees a segment on the employment of handicapped individuals.	11-21-75	12-29-75	CSC	Implemented-- FPM instructions have been issued and will be continued in subsequent FPM's.	Closed
26	It is recommended that in addition to the factors for selection for training mentioned in the Federal Personnel Manual (FPM), paragraph 3-6b, chapter 410, a statement be added that, where otherwise qualified, there should be no discrimination in selection on the basis of physical or mental handicap.	11-21-75	12-29-75	CSC	In Process--Chapter 410 will be rewritten, and the language in this recommendation will be included. Target Date: July 1, 1978.	July 1978 Review
27	It is recommended that the Interagency Committee on Handicapped Employees and the Civil Service Commission share the responsibility for intensifying public information programs in the area of employment of handicapped individuals in the Federal Government. In addition to the development of new informational programs, assistance should be provided to agencies in developing programs to be administered by their public information offices. The resources of the President's Committee on Employment of the Handicapped, and the President's Committee on Mental Retardation should be utilized.	11-21-75	N/A	CSC/ ICHE	In Process--All of the ICHE recommendations for increased public affairs activities were delayed until additional staff resources could be obtained. An individual with the desired background joined the ICHE staff March 13, 1978. Efforts have commenced with regard to this and other recommendations dealing with public affairs activities.	July 1978 Review
28	It is recommended that the major focus of public information programs be to include handicapped individuals and employees in regular public information activities. Most of the present effort by public information programs is geared to publicize handicapped programs and feature exceptional handicapped workers. We are suggesting not that this be diminished but that the major focus be changed to one that emphasizes the characteristics of an individual's life other than his or her disability. An example would be to include a picture of a handicapped person in an article that has nothing to do with the individual's disability and possibly makes no reference to it.	11-21-75	N/A	CSC/ ICHE	See Recommendation 27.	

APPENDIX II

APPENDIX II

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
29	It is recommended that public information offices be asked to publicize "success stories" in jobs which show upward mobility and possibilities for promotions. There should be little publicity given to handicapped individuals working in "dead-end" jobs. Care should be taken in public relations efforts not to perpetuate the idea of stereotyped positions or to create new ones.	11-21-75	N/A	CSC/ ICHE	See Recommendation 29.	
30	It is recommended that agency employee clubs and organizations be urged to offer a wider range of activities that would encourage the participation of all employees, including handicapped persons, in their internal as well as interagency activities. It would be desirable for handicapped employees to be included on planning committees of such organizations. All social activities should be made accessible to any persons wishing to attend.	11-21-75	N/A	ICHE	Implemented--Letter dated August 1, 1977.	Closed
31	It is recommended that agencies make clear to all employees that priority parking privileges awarded to handicapped employees may be given to a nonhandicapped driver who provides transportation for a handicapped employee who is unable to drive but is otherwise eligible to receive priority parking privileges. It is further recommended that the General Services Administration parking regulations be amended to clearly reflect this interpretation the next time that they are rewritten.	11-21-75	12-29-75	GSA	Implemented--Federal Property Management Regulations have been amended. See Federal Register, February 28, 1978, page 8139.	ICHE will follow up... see that sufficient publicity is given to this policy. July 1978 Review
32	It is recommended that agencies be encouraged to place handicapped persons in positions that involve interaction with large numbers of other employees, particularly with supervisors. For example, a position such as a trainer in the employee development office or rotational assignments, where appropriate, would result in considerable contact with a large number of agency employees.	11-21-75	12-29-75	CSC	In Process--Has been included in the draft rewrite of the Handbook. Target Date: June 30, 1978.	July 1978 Review

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
33	It is recommended that agencies explore means other than those mentioned above to encourage regular ongoing interaction between handicapped and nonhandicapped employees regarding job related issues. Staff meetings, "rap sessions," etc., were discussed, but the manner in which this recommendation would be carried out would depend on the organizational structure of the agency.	11-21-75	12-29-75	CSC	In Process--Has been included in the Draft Rewrite of the Handbook. Target Date: June 30, 1978.	July 1978 Review
34	It is recommended that all incentive award programs at Governmentwide and agency levels be reviewed and, where appropriate, an employee's contributions to affirmative action program efforts for the employment of handicapped individuals be included in the criteria for nomination.	11-21-75	12-29-75	CSC	Implemented--Authority to recognize such contributions already exists in both regulations and guidance. Steps have been taken to assure that agency headquarters are aware and future publications of the Office of Incentive Systems will continue to provide clarification.	Closed
35	It is recommended that the narrative discussion of the 10 most critical attitudes that affect the employability of handicapped individuals as identified by the work group on attitudinal barriers be published and distributed to agency coordinators, supervisors, and other appropriate Federal employees.	11-21-75	N/A	ICHE	Implemented--Used in supervisory training package. Has been reprinted and over 100 copies have been mailed out upon request. Also, permission has been granted for reprinting.	Closed
36	It is recommended that the Federal Personnel Manual (FPM), Chapter 316, subchapter 4-7c(1)(b) be amended by adding the following paragraph. "700-hour appointments for severely physically handicapped individuals or mentally restored persons. In these cases the appointments can be made at the same grade level as the position for which the person is being considered. In these cases the restriction of GS-7 and below does not apply."	11-21-75	12-29-75	CSC	Implemented--See FPM Letter 316-13, March 17, 1977.	Closed
37	It is recommended that the Federal Personnel Manual (FPM) chapter 306, subchapter 6-3c(4) be amended by eliminating: "Promotions to positions above GS-3 grade level, or equivalent, should not be made. If growth and development of the individual on the job are such that he would be selected for a position above the GS-3 level, or equivalent, conversion to a career appointment through an appropriate examination should be undertaken."	11-21-75	12-29-75	CSC	Implemented--See FPM Bulletin 306-12, June 6, 1977. Also, will be included in FPM rewrite.	Closed

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
38	It is recommended that the Federal Personnel Manual (FPM) chapter 306, subchapter 4-2g be amended by changing the first sentence to read as follows: "Prior approval is required for promotions within the same broad occupational group."	11-21-75	12-29-75	CSC	Implemented--See FPM Letter 213-16, dated April, 9, 1976.	Closed
39	It is recommended that the Civil Service Commission take the appropriate action to amend Federal Personnel Manual (FPM), chapter 306, subchapter 4-2 to permit a conversion to career status for those severely handicapped employees appointed under section 213.3102(u) of Schedule A who have demonstrated ability to perform satisfactorily for a given period of time. This may be accomplished by adding at the end of subchapter 4-2 the following paragraph: "J. Conversion to Career Status. After 3 years of continuous service with the Federal Government the individual may be converted, non-competitively, to a career appointment upon recommendation of the agency; endorsement of the State Rehabilitation or Veterans Administration counselor (if applicable); and with prior Civil Service Commission approval." This recommendation may also require a change in chapter 315.	11-21-75	12-29-75	CSC	In Process--This recommendation was presented to the IAC Committee on Staffing on November 16, 1977. Based on comments received from the IAC and others, a recommendation is being forwarded for Commission action. Target Date: March 31, 1978	July 1978 Review
40	It is recommended that the word "current" be struck from the phrase "current medical examination" in the certification requirements found in the Federal Personnel Manual (FPM), chapter 306, subchapter 4-2(e) and (f). This action does not remove an agency's responsibility to obtain information required to establish medical eligibility.	11-21-75	12-29-75	CSC	In Process-- This has been included in the rewrite of FPM Chapter 306, which is currently at the printer. Target Date: April 15, 1978.	July 1978 Review
41	It is recommended that the Civil Service Commission review their medical standards for positions and revise them as necessary to reflect current standards of job relatedness and current legislative intent to provide equal employment opportunities for handicapped individuals. Medical standards are established by the Commission except in those few instances where a position is of such a limited nature that it only applies to employment in one agency. In these cases the agency establishes the medical standards and should be urged to carry out the intent of the above recommendation.	11-21-75	12-29-75	CSC	In Process--This is being accomplished by the Bureau of Policy and Standards, and Retirement, Insurance, and Occupational Health. The responsibilities that will fall on individual agencies have been addressed in the rewrite of FPM Chapter 306 and are included in the rewrite of the Handbook.	ICHE feels that this recommendation needs to be given higher priority. July 1977 Review.

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
42	It is recommended that the Civil Service Commission establish a "120 Day Trial Performance Appointment" for applicants who meet the competitive qualifications, are within reach on the register, or otherwise are eligible for employment by such means as reinstatement but who fail to meet the medical specifications established for the desired position. The "120 Day Trial Performance Appointment" would be granted only to those applicants who the agency appointing officials feel could perform the duties of the position without hazard to himself or others. The procedures should be well spelled-out and the applicant should have full understanding of the nature of the appointment. Separation, if necessary, should be a simple procedure during the 120 days. If it is found that the employee is performing efficiently at the end of the 120 days he should be converted to a career or career-conditional appointment. An employee who has received such a recommendation should be permitted to remain in the position until the conversion process is completed. ("120 Days" refers to calendar days.)	12-29-75	11-29-75	CSC	Not Implemented--CSC feels that sufficient authorities are available to meet the intent of the recommendation. There is currently a procedure that provides for the waiving of the Commission medical standards. (FPM 339, 2-3). Also, there is currently a procedure that allows for noncompetitive conversion to career status for employees formally reached on a register (FPM 315, 713).	ICHE feels that the authorities cited are not adequate as written to meet the intent of the Recommendation. ICHE asked that the language be clarified. July 1978 Review.
43	It is recommended that the physical standards for appointment to Foreign Service Officer positions be reviewed by the State Department and revised accordingly to reflect current requirements for job-relatedness and in order to eliminate unnecessary barriers to employment of handicapped individuals.	11-21-75	3-23-76	ICHE/ STATE DEPT.	Partially Implemented--The standards have been revised to the extent that they will now permit the employment of some handicapped individuals who were previously ineligible.	ICHE will invite State to next meeting to present changes that have been made.
44	It is recommended that agencies be encouraged to increase participation in Civil Service Commission training programs for coordinators at the headquarters and regional level.	11-21-75	12-29-75	CSC	Implemented--Through issuances to agencies.	Closed
45	It is recommended that the Civil Service Commission act as a catalyst to provide ongoing meetings for agency coordinators at its headquarters and in its regions.	11-21-75	12-29-75	CSC	Partially Implemented--Continuing efforts need to be made in this area.	January 1979 Review

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
46	It is recommended that the Civil Service Commission promulgate regulations for the implementation of affirmative action programs for the hiring, placement, and advancement of handicapped individuals in the Federal Government. This action should be in addition to the instructions appearing in the Federal Personnel Manual and would be included in the Code of Federal Regulations.	11-21-75	12-29-75	CSC	No Need to Implement--Ample authority now exists to implement provisions of the Rehabilitation Act, making it unnecessary for CSC to adopt special regulations.	Closed
47	It is recommended that the Interagency Committee on Handicapped Employees publish through the Civil Service Commission periodic reports on its activities and a summary of the status of affirmative action programs in the Federal Government. This report should be distributed to organizations, State rehabilitation agencies, and State employment security offices, and be made available to other appropriate organizations and agencies upon request.	11-21-75		CSC/ICHE	In Process--See Recommendation 27.	July 1978 Review
48	It is recommended that the Civil Service Commission provide appropriate training programs such as workshops or seminars, for agency personnel responsible for the preparation and implementation of affirmative action program plans in order to enhance individual agency progress and provide for an exchange of ideas.	11-21-75	12-29-75	CSC	Implemented--First seminars conducted on February 9-10, 1976, at the Civil Service Commission and will be continued.	Closed
49	It is recommended that the Chairman of the Civil Service Commission communicate with heads of agencies that have not submitted an affirmative action plan, or have submitted an unacceptable plan, and urge them to submit an acceptable plan.	11-21-75	12-29-75	CSC	No Need to Implement--Action covered by ICHE letters to agencies.	Closed
50	It is recommended that regulations be issued that would require each department and agency to designate a Coordinator for Selective Placement at a level within the administrative structure to ensure ready access to highly placed responsible officials and command attention from mid and lower level management.	11-21-75	12-29-75	CSC	In Process--Has been included in rewrite of Chapter 306 currently at printer's and is included in the draft rewrite of the Handbook. Target Date: June 30, 1978.	July 1978 Review

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICMHE ACTION
51	<p>It is recommended that each department and agency with at least 3,000 employees be encouraged to appoint full-time program manager(s) to coordinate the implementation of affirmative action programs for handicapped individuals and disabled veterans at the headquarters level and in each component with at least 3,000 employees. The program manager may be designated as the Coordinator for Selective Placement if appropriate.</p>	11-21-75	12-29-75	CSC	<p>In Process--Has been included in rewrite of Chapter 306 currently at printer's and is included in the draft rewrite of the Handbook. Target Date: June 30, 1978.</p>	July 1978 Review
52	<p>It is recommended that legislation be initiated to provide funds for rehabilitation services for Federal employees whose continued employment has been threatened because of a disability or who have already been placed on the disability retirement rolls. An amendment to the Civil Service Retirement Act may be an appropriate vehicle to accomplish such legislation. Also recommended is the establishment of a rehabilitation unit within the Civil Service Commission structure to evaluate a disabled person's potential for rehabilitation and ability to return to work. Rehabilitation services would be provided by the State agency by the special appropriated funds.</p>	11-21-75	12-29-75	CSC	<p>Under Study--This recommendation has been included in a comprehensive study now being undertaken in regard to the entire Federal retirement program. Target Date: January 30, 1979.</p>	July 1979 Review
53	<p>It is recommended that Federal Personnel Manual (FPM), chapter 306, and Supplement 831-1 be revised to encourage agencies to:</p> <ul style="list-style-type: none"> o use a "detail" as a mechanism for giving employees who become disabled an opportunity to try a new position, if they should so choose, and o use a temporary appointment as a mechanism for giving disability annuitants an opportunity to return to employment in a new position, if they should so choose. 	11-21-75	12-29-75	CSC	<p>In Process--Has been included in the rewrite of FPM Chapter 306 currently at the printer's, and is included in the draft rewrite of the Handbook. Target Date: June 30, 1978</p>	July 1978 Review

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICMHE ACTION
54	It is recommended that the provisions of the Displaced Employees Program affecting employees who have recovered from disabilities be given wide publicity and strong emphasis. Also, the Commission area offices should be reminded to strictly enforce the provisions of the program.	11-21-75	12-29-74	CSC	In Process--CSC Operations Letter 330-110. Also, has been included in the rewrite of FPM Chapter 306, currently at the printer's, and is included in the draft rewrite of the Handbook. Target Date: June 30, 1978	July 1978 Review
55	It is recommended that a copy of the "Recovery from Disability" form (BRI 46-10) be sent to personnel offices of former employees at the time the former employees are notified of the pending cessation of disability payments and subsequent eligibility to be enrolled in the Displaced Employees Program.	11-21-75	12-29-75	CSC	Under Study--The Bureau of Retirement, Insurance, and Occupational Health has suggested that they send two copies of the form to the recovered annuitant. This would allow the annuitant to forward a copy to the former personnel office. Target Date: May 31, 1978	July 1978 Review
56	It is recommended that a study be undertaken to develop appropriate appeal procedures for applicants and employees who feel they have been discriminated against on the basis of handicap.	11-21-75	12-29-75	CSC	Implemented--See Recommendation 11.	Closed
57	It is recommended that part-time appointments of handicapped students under section 213.3102(t) and 213.3102(u) of Schedule A be ceiling exempt under the same conditions as the Stay-in-School Program.	11-21-75	12-29-75	CSC	See Recommendation 58.	
5d	It is recommended that the requirement for obtaining prior Civil Service Commission approval for appointments under section 213.3102(u) of Schedule A be waived when this authority is used to hire handicapped students. If a student plans to enter permanent employment under section 213.3102(u) with the same agency where he worked as a part-time student, prior approval of the Civil Service Commission would then be required.	11-21-75	12-29-75	CSC	Under Study--In lieu of implementing Recommendations 57 and 58, consideration is being given to including handicapped individuals in the Stay-in-School program without regard to need criteria. Target Date: April 15, 1977	July 1978 Review

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICR/ACTION
59	<p>The Commission's regulations should be amended to indicate that agencies can apply for exceptions in those cases where a severely physically handicapped or mentally retarded student would not be able to participate in a student or summer employment program unless he worked at the same agency as his parent. In no event should a child be permitted to work in a situation where his parent has direct or indirect supervisory control.</p>	11-21-75	12-29-75	CSC	Implemented--See page 31436, Federal Register, Volume 42, Number 119, Tuesday, June 21, 1977.	Closed
60	<p>It is recommended that the following actions be taken:</p> <ul style="list-style-type: none"> o Encourage agencies to offer courses in sign language for supervisors and other coworkers of deaf employees. o Initiate appropriate action to permit agencies to pay for interpreters for deaf employees whose attendance at major meetings or conferences is important to the discharge of their job responsibilities or during a period of concentrated need. o Encourage agencies to include interpreting skills in clerical and other position descriptions as appropriate. o Initiate appropriate action that will permit an agency to hire full-time, part-time, when-actually employed, and intermittent interpreters on the basis of employee need and/or the function of the agency (i.e., providing a regular service to deaf individuals). 	11-21-75	12-29-75	CSC	Implemented--See FPM Bulletins 306-8 and 306-9 issued on November 18, 1975, and November 24, 1976.	Closed
61	<p>It is recommended that appropriate action be initiated that will permit agencies to hire full-time, part-time, when-actually employed, and intermittent (salaried) readers if justified on the basis of employee need and/or function of the agency (i.e., provides a regular service to blind individuals).</p>	11-21-75	12-29-75	CSC	Sufficient authorities exist to meet the intent of this part of the Recommendation 67.	Closed

APPENDIX II

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
62	It is recommended that an item be included on a tear-off sheet on the Standard Form 171 Personal Qualification Statement, and other comparable forms, regarding the policy of the Federal Government to provide affirmative action in the area of hiring, placement, and advancement of handicapped individuals in Federal employment. The item should include information on the selective placement program and provide a voluntary opportunity for an applicant to request selective placement services.	11-21-75	12-29-75	CSC	Under Study--The question of the most appropriate manner to obtain minority data for affirmative action purposes is still being studied. It is expected that this recommendation will be implemented when that issue has been resolved. Meanwhile, examining announcements will continue to be revised to include information on the Federal Government's affirmative action policies.	January 1979 Review
63	It is recommended that the Interagency Committee on Handicapped Employees commend the Civil Service Commission, specifically the Bureau of Policies and Standards, for the extraordinary efforts made in adapting test procedures for the Professional and Administrative Careers Examination to accommodate blind and deaf competitors.	11-21-75	3-23-75	CSC	Implemented.	Closed
64	It is recommended that the Civil Service Commission broaden the criteria used for determining eligibility for appointment under section 213.3102(u) to include qualified persons with histories of mental or emotional disorders.	6-21-76	11-3-76	CSC	Under Study--Various alternatives are being studied that would increase affirmative action efforts for qualified persons with histories of mental or emotional disorders. Target Date: September 30, 1978.	An ICHC work group will be established to address this issue. January 1978 Review
65	In order to encourage greater use of section 213.3102(u) of Schedule A, we recommend that the language be changed to clarify that persons with severe invisible disabilities are eligible.	6-21-76	11-3-76	CSC	In Process--Has been included in rewrite of FPM Chapter 306 currently at the printer's and in the draft rewrite of the Handbook.	July 1978 Review.
66	Establish a work group to address issues related to the employment of disabled veterans.	6-21-76	N/A	ICHE	Implemented--The work group has completed its first report and will continue to meet on an as needed basis.	Closed
67	It is recommended that the agencies represented on the ICHC share the responsibilities of implementing a public affairs program by making a commitment to include articles generated within the agencies that they represent.	12-10-76	N/A	ICHE	Implemented--This was essentially implemented when adopted by the ICHC on 12-10-76. The ICHC Standing Committee members are serving as agency contacts.	Closed

APPENDIX II

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
68	It is recommended that the agencies represented on the ICHE provide the staff resources to write the articles based on reports generated by ICHE. Such a procedure would enable an agency to present the material in such a way that it conforms in style to the other articles in its publication and stresses that aspect of the ICHE material that is most closely related to the purpose of the publication or of greatest interest to its readers.	12-10-76	N/A	ICHE	<u>Implemented--Recommendation 67.</u>	Closed
69	It is recommended that each of the agencies represented on the ICHE agree to consider accepting full responsibility of publishing any special document that may be generated by an ICHE activity but does not lend itself to article format. It is expected that this situation would be extremely rare, however, the handbook that one of the work groups is now working on would probably be an example. The agency's decision to publish such a document could be based on whether the material is consistent with the agency's ongoing mission. In such a case it would be appropriate for the agency to publish the material under its own name with credit given to the ICHE as a contributor.	12-10-76	N/A	ICHE	<u>Implemented--See Recommendation 67.</u>	Closed
70	It is recommended that the ICHE request from the President's Committees on Mental Retardation and Employment of the Handicapped the kind of support that each of its member agencies is asked to commit in the above recommendations. Such a request would be consistent with the legislated mandate that such resources be utilized.	12-10-76	N/A	ICHE	<u>Implemented--Both Committees indicated that they would print articles, however, could not provide funds.</u>	Closed
71	It is recommended that the ICHE request the support of the Department of Commerce and the National Association of Government Communicators in the same manner as requested of Committee members in Recommendation Number 67.	12-10-76	N/A	ICHE	<u>Partially Implemented--Letter to Commerce sent dated August 1, 1977. Letter to NACC being prepared.</u>	January 1978 Review

APPENDIX II

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IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
72	It is recommended that the CSC Bureau of Training be requested to provide interpreter or reader services for an individual or individuals needing such a service and enrolled in a CSC Bureau of Training class. This takes the responsibility off of the agency to assure that five deaf enrollees have signed up for the course in order to avoid using their limited training funds for interpreter services.	12-10-76	2-15-77	CSC	Under Study--A favorable Commenter General's opinion has been received. BT's policy is being reviewed with consideration given to adopting the Recommendation. Target Date: April 28, 1978.	July 1978 Review
73	It is recommended that the Civil Service Commission publicize its policy regarding the provision of reader and interpreter services in its Bureau of Training courses.	12-10-76	2-15-77	CSC	Under Study--See Recommendation 72. Target Date: June 30, 1978.	July 1978 Review
74	It is recommended that agencies be informed of their ability to use training funds for purchasing interpreters and reader service within training programs given in the agency.	12-10-76	2-15-77	CSC	Partially Implemented--Interpreter General's opinion has been distributed to agency Coordinators and to the members of the IAC Committee on Development and Training. Also, an LPM Letter will be prepared. Target Date: March 15, 1978.	July 1978 Review
75	It is recommended that organizations for deaf and blind persons be informed regarding the policy of the Federal Government in training handicapped employees so that they can inform their constituents.	12-10-76	2-15-77	CSC	See Recommendation 7	
76	It is recommended that the Civil Service Commission make agency training officers and Coordinators for Selective Placement aware that there may be educational resources available to handicapped persons in their community. Agencies should identify these resources and make this information available to handicapped employees who request training either to acquire a specific job skill or to meet a "unique training need."	12-10-76	2-15-78	CSC	In Process--Will be included in LPM Letter cited in item 74. Target Date: April 15, 1978.	July 1978 Review

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICBE ACTION
77	It is recommended that the Civil Service Commission's Bureau of Training establish, through a 3-year demonstration project, a centralized skills training facility for deaf and blind federal employees which would have a mission and responsibility nationwide. This facility would offer specially prepared skills training classes designed to most effectively present material to participants in light of their handicaps. Deaf persons would go to courses for the deaf, and blind persons would attend courses for the blind. In each instance, class presentation, methodology, philosophy, emphasis, and pace would be geared to the specific group being taught.	12-10-76	2-15-77	CSC	Under Study--BT has proposed a needs survey prior to initiating action to adopt this Recommendation. Target Date: January 1, 1979.	January 1979 Review
78	It is recommended that the Commission's Bureau of Training take appropriate steps to make all regularly scheduled informational courses nationwide responsive to the special communication needs of deaf and blind participants.	12-10-76	2-15-77	CSC	Under Study--Consideration is being given to including a module on "Training Needs of Deaf and Blind Individuals" in BT's "Instructor Training" course. Target Date: September 30, 1978.	January 1979 Review
79	It is recommended that the Civil Service Commission take steps to assure that agency training officers develop the skills and sensitivity required to adapt skills training program to meet the needs of communication-impaired trainees within their agencies.	12-10-76	2-15-77	CSC	Under Study--BT has proposed that this be accomplished by conducting showcases, publishing information in the Federal Trainer, and disseminating "How to" informational booklets. Target Date: November 1978.	January 1979 Review
80	It is recommended that the Commission's Bureau of Training select, after an appropriate survey, a region with a high concentration of handicapped employees to conduct a pilot study to test the effectiveness of establishing special skills training courses within Federal agencies. Commission staff would be responsible for assisting agency trainers within the selected region to adapt special skills courses to meet the needs of blind and deaf employees. Records should be kept of the costs to agencies using a centralized skill training facility.	12-10-76	2-15-77	CSC	Under Study--See Recommendation 77. Target Date: January 1, 1979.	January 1979 Review

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICHE ACTION
81	It is recommended that CSC conduct a study in selected area offices over a sufficient period of time to determine the incidence of agency requests to pass over a preference eligible and the frequency with which such requests are approved by CSC.	9-20-79		CSC		
82	It is recommended that the Chairman of CSC, the Secretary of Labor (DOL), and the Administrator of VA encourage their staff members involved in the placement of disabled veterans and other handicapped persons to participate fully in Governor's and Mayor's Committees on Employment of the Handicapped, State Veterans Employment Committees, Federal Executive Boards, Regional and Interagency Jobs for Veterans Committees, and Manpower Planning Councils under DETA. Also agency staff should be encouraged in their participation on these Committees to work toward making them a forum for developing greater liaison among those organizations and agencies involved with the placement of disabled veterans and other handicapped individuals.	9-20-78		CSC/DOL VA		
83	It is recommended that Veterans Administration--DOL continue negotiations to revise their working agreement relative to providing adequate placement assistance to disabled veterans who satisfactorily complete vocational rehabilitation under chapter 31, title 38, U.S. Code. When completed, a copy of the revised working agreement is to be furnished to the ICHE for review to assure that placement assistance provided to the disabled veteran does not "fall through the cracks".	9-20-77		DOL/VA ICHE		
84	It is recommended that the ICHE invite the Postmaster General to a future meeting to discuss ways to assure compliance within the USPS with the mandates of section 501 of Public Law 93-117 and section 402 of Public Law 93-508.	9-20-77		USPS/ICHE		

IDENTIFICATION NUMBER	RECOMMENDATION	DATE ADOPTED	DATE TRANSMITTED	AGENCY	CURRENT STATUS	ICRIS ACTION
85	It is recommended that CSC expand its annual report to Congress to include the status of affirmative action efforts in all agencies in the executive branch of Government (including temporary agencies and the government of the District of Columbia).	2-23-78	2-23-78	CSC	In Process--CSC plans to implement this Recommendation in the 1978 report.	January 1978 Review
86	It is recommended that the format for submission by agencies with 30-100 employees be modified.	2-23-78	2-23-78	CSC	<u>Implemented.</u>	Closed
87	It is recommended that the format for submission by agencies with fewer than 30 employees be a letter from the head of the agency with a report of employment data.	2-23-78	2-23-78	CSC	<u>Implemented.</u>	Closed
88	It is recommended that CSC notify appropriate agencies that their affirmative action efforts will be included in the annual report to Congress.	2-23-78	2-23-78	CSC	In Process-- Appropriate issuances are being prepared.	July 1978 Review
89	It is recommended that CSC issue to agencies under 100 employees, instructions for submitting modified affirmative action plans.	2-23-78	2-23-78	CSC	In Process--Appropriate issuances are being prepared.	July 1978 Review